

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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February 9, 2022

**VIA ECF**

Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Joel Alvarez-Espinal  
21 Cr. 495 (DLC)**

Dear Judge Cote:

I write in response to the Court's January 19 order. Mr. Alvarez-Espinal does not intend to go to trial. To that end, I would like to request a change of plea hearing on February 28, March 1, or March 2, if these dates are amenable to the Court. I will be in trial beginning next week and unable to schedule a proceeding sooner.

*The plea will be taken on  
3/1/22 at 2<sup>00</sup> pm in  
Courtroom 18B.*

*Jennifer L. Brown  
2/9/22*

Respectfully submitted,

/s/Zawadi Baharanyi

Zawadi Baharanyi, Esq.  
Counsel for Julian Alvarez-Espinal  
212-417-8735

cc: AUSA Matthew Shahabian.